

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:19MJ3190
)	
Plaintiff,)	
)	MAGISTRATE JUDGE THOMAS M.
vs.)	PARKER
)	
CHARLES VACCARO,)	
)	<u>DEFENDANT'S UNOPPOSED MOTION</u>
Defendant.)	<u>FOR PERMISSION TO TRAVEL</u>

Now comes Defendant, Charles Vaccaro, by and through undersigned counsel, and respectfully moves this Honorable Court for an order allowing him to travel to Philadelphia, Pennsylvania from October 17, 2019 through October 20, 2019 to visit his son, a freshman at Drexel University, for parents' weekend. The U.S. Attorney's Office and Defendant's Pretrial Services officer have both consented to Defendant's request to travel for this specific basis.

Defendant avers the following in support of his request for permission to travel: 1) Defendant has complied with all conditions of his bond; 2) Defendant is in constant communication with his pretrial services officer; 3) Defendant has not had any allegations of violating the terms or conditions of his bond nor engaged in conduct violative of this Court's order since the inception of his case; and 4) Defendant has demonstrated he is amenable to pretrial release in the community with no risk of recidivism. Defendant will keep his supervising officer informed of all details regarding his travel itinerary and promptly notify his officer when he arrives in Philadelphia and when he returns to the Southern District of Florida.

Respectfully submitted,

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Attorneys for Defendant Charles Vaccaro

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2019, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Paul M. Flannery

Paul M. Flannery

Attorney for Defendant Charles Vaccaro